

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

THE UNITED STATES OF AMERICA,

v.

**SAINT JOVITE YOUNGBLOOD
a.k.a. Kota Youngblood,
Defendant.**

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CRIMINAL NO. A-23-CR-135-RP

GOVERNMENT’S MOTION FOR LIMITED SEALING OF EXHIBITS

The Government respectfully requests that the exhibits below be sealed pending further order of the Court.¹ As explained herein, as to the temporary sealing of each of these exhibits, the public’s qualified right of access to judicial records is outweighed by legitimate countervailing rights of the defendant, witnesses, victims, or law enforcement.² See *S.E.C. v. Van Waeyenberghe*, 990 F.2d 845, 848 (5th Cir. 1993) (“In exercising its discretion to seal judicial records, the court must balance the public’s common law right of access against the interests favoring nondisclosure.”).

¹ The Government seeks temporary sealing of these exhibits at least until the time of Youngblood’s sentencing, to allow the Government sufficient time to propose appropriate redactions of these exhibits for eventual public disclosure. Additionally, the Government’s sealing request should not be construed as limiting the parties’ access to the relevant exhibits for lawful litigation purposes, consistent with this Court’s protective order [ECF No. 30].

² Public access to judicial records serves to promote trustworthiness of the judicial process, to curb judicial abuses, and to provide the public with a more complete understanding of the judicial system, including a better perception of its fairness. *Littlejohn v. Bic Corp.*, 851 F.2d 673, 682 (3d Cir. 1988). Immediate and full disclosure of the identified exhibits would not meaningfully further these purposes, as balanced against countervailing factors, including victims’ rights to be treated with fairness and with respect for their dignity and privacy. See 18 U.S.C. § 3771(a)(8).

| <u>Exhibit Number</u> | <u>Exhibit Description</u> | <u>Justification For Sealing</u> |
|--|---|--|
| G-2 ³ | Youngblood passport and passport card | Contains personally identifiable information (PII) of defendant and disclosure serves little legitimate public interest. |
| G-4 | Holloway will | Contains PII, including reference to a minor. |
| G-11 | Youngblood birth certificate | Contains PII. |
| G-13 | Youngblood tax returns | Contains PII, including PII of a minor; statutorily protected federal tax information. |
| G-21 – G-22, G-24, G-31, G-33 – G-57, G-60 – G-63; D-59 – D-70 (not including sub-exhibit transcripts) | Audio/Video Recordings Involving Undercover Agent | Agent still works as undercover agent in other cases; publication of his likeness and voice could endanger him. |
| G-69 | Copy of DOJ search | Contains PII of defendant. |
| G-72 | Levins – Witness Testimony DOJ Youngblood | Contains PII of defendant. |
| G-75 | Flag appraisal email - Perardi Bridgman | Contains PII. |
| G-76 | Flag Invoice - April 2022 - Bridgman Youngblood | Contains PII. |
| G-78 | Flag Payments - Knecht Wire Transfers | Contains PII, including bank account numbers. |
| G-84 – G-104 | Eric Perardi Financial Documents | Contains PII, including bank account numbers. |
| G-105 | Perardi - Clock Emails | Contains PII. |
| G-115 | Steiner Ranch Truth (@TruthRanch) – Twitter | Contains PII. |
| G-116 – G-119 | Perardi Financial Documents | Contains PII, including bank account numbers. |
| G-120 – G-122 | Lane Holloway Financial Documents | Contains PII, including bank account numbers. |
| G-123 | Lane Holloway Family Name Change Order | Contains PII, including PII of minors. |
| G-125 | Derogatory Flyers | Contains PII and derogatory, false statements about victims. |

³ Government exhibits are denoted in this table as G-# and defense exhibits are denoted D-#.

| <u>Exhibit Number</u> | <u>Exhibit Description</u> | <u>Justification For Sealing</u> |
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| G-2 ³ | Youngblood passport and passport card | Contains personally identifiable information (PII) of defendant and disclosure serves little legitimate public interest. |
| G-138 | Lane Holloway - Wire Receipts | Contains PII. |
| G-139 – G-140, G-142 – G-143, G-161 – G-163 | Lane Holloway Notes and Excerpts | Contains PII, including PII of minor. |
| G-144 | February 2023 Yelp Review | Contains PII and derogatory, false statements about individuals. |
| G-167 | Photo of dog tags | Contains PII of defendant. |
| G-177 – G-182 | James Holloway Financial Documents | Contains PII, including bank account numbers. |
| G-188, G-191, G-197 – G-218 | Gary Snider Financial Documents | Contains PII, including bank account numbers. |
| G-192 – G-196 | Gary Snider Videos | Contains images of victims and the interior of their residence. |
| G-245 | Hanfu Lee - Money Paid to Youngblood from 2010 to 2017 | Contains PII. |
| G-247 | Hanfu Lee - Money Paid to Youngblood in 2023 | Contains PII. |
| G-249 – G-250 | Hanfu Lee Financial Documents | Contains PII, including bank account numbers. |
| G-251 | Youngblood July 2023 Navy Federal Statement and Wires | Contains PII, including bank account numbers. |
| G-284 | Photo of Credit Cards | Contains PII of defendant, including account numbers. |
| G-295 | Southwest Airlines Records | Contains PII, including PII of minor. |
| D-1 – D-8 (including sub-exhibits of D-1), D-42, D-44 – D-57, D-101, D-104, D-111, D- | Eric Perardi Financial Documents | Contains PII, including bank account numbers. |

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| 144 – D-146 | | |
| D-9 – D-10, D-13, D-15, D-84 – D-85, D-89 – D-90, D-107 | Eric Perardi Emails | Contains PII. |
| D-14 | Perardi engagement letter with Steve Toland Law Office | Contains PII. |
| D-17 – D-18 | James Holloway Checks | Contains PII, including bank account numbers. |
| D-20 – D-22 | James Holloway Financial Documents | Contains PII, including bank account numbers. |
| D-23 – D-27 | Gary Snider Financial Documents | Contains PII, including bank account numbers. |
| D-28 | Excel Spreadsheet created by Hanfu Lee | Contains PII. |
| D-32 | Letter from Hanfu Lee dated March 27 2019 | Contains PII. |
| D-34, D-36, D-39 | Hanfu Lee Financial Documents | Contains PII, including bank account numbers. |
| D-41 | Oct 21 James threat 2024-04-17 | Contains PII. |
| D-86 | John Mapes IOU from Perardi 10.07.2022 | Contains bank account number. |
| D-88 | James text messages produced by Perardi | Contains PII, including PII of minor. |
| D-91 | Eric Perardi texts to FBI agents May 2023 2024-04-21 | Contains PII. |
| D-110 | 2022.07.28.Perardi.RP.Further TOs | Contains PII, including PII of minor. |
| D-149 | Text message Gary Snider and Agent Noble Oct 5 | Contains PII. |

The undersigned hand-delivered a copy of this motion to defense counsel on June 20, 2024, and he preliminarily indicated he was not opposed. The undersigned asked counsel to express any

opposition by 5pm today; none has been received as of the time of this filing. The Government therefore believes this motion is unopposed.

For the foregoing reasons, the Government requests temporary, limited sealing of the above exhibits until further order of this Court.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

By:

 /s/
MATT HARDING
DANIEL D. GUESS
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Government's Motion was hand-delivered on June 20, 2024, and has been delivered via electronic delivery on the CM/ECF system on June 21, 2024, to:

Jeff Senter
Attorney for Defendant Saint Jovite Youngblood

/s/
Matt Harding
Assistant United States Attorney

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ORDER

The Court having considered the Government's Motion For Limited Sealing Of Exhibits, it is hereby

ORDERED that the Government's motion is GRANTED;

IT IS FINALLY ORDERED that the following exhibits shall be SEALED until further order of this Court, for substantially the reasons stated in the Government's motion. Nothing in this order shall be construed as limiting the parties' use of exhibits for litigation in this case, provided such use is consistent with this Court's protective order [ECF No. 30].

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| D-149 | Text message Gary Snider and Agent Noble Oct 5 |

SIGNED this _____ day of _____, 2024.

ROBERT L. PITMAN
UNITED STATES DISTRICT JUDGE